

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VOIP-PAL.COM, INC.

Plaintiff,

v.

AMAZON.COM, INC.;
AMAZON.COM SERVICES LLC; and
AMAZON WEB SERVICES, INC.,

Defendants.

CIVIL ACTION NO. 6:21-cv-668-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.;
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS;
VERIZON SERVICES, CORP.; and
VERIZON BUSINESS NETWORK
SERVICES, INC.,

Defendants.

CIVIL ACTION NO. 6:21-cv-672-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

T-MOBILE USA, INC.

Defendant.

CIVIL ACTION NO. 6:21-cv-674-ADA

FIRST SUPPLEMENTAL JOINT CLAIM CONSTRUCTION STATEMENT

Plaintiff and Defendants submit this First Supplemental Joint Claim Construction Statement to set forth certain stipulated constructions for U.S. Patent Nos. 8,630,234 and 10,880,721. This Supplemental Statement is needed because at the time the parties submitted their Joint Claim Construction Statement, the number of disputed terms exceeded the Court's default limits on the number of terms that can be construed during normal claim construction briefing. Consequently, certain means-plus-function claim terms could not be submitted to the Court for construction. The parties have met and conferred to resolve their disputes regarding these means-plus-function terms and the parties' stipulated constructions are included in the table below.

I. AGREED-UPON CLAIM TERMS:

Claim Term	Agreed Construction
<p>"means for communicating with the routing controller to obtain from the routing controller the access code"</p> <p>'721 patent, claim 34</p>	<p>Function: "communicating with the routing controller to obtain from the routing controller the access code"</p> <p>Corresponding structure: An I/O port of an access server, an I/O port of a routing controller and/or at least one processor (e.g., 152 in Figure 6) performing a method equivalent to process 190, including block 196, in Figure 7, to transmit a request to the routing controller.</p>
<p>"means for producing an access code"</p> <p>'234 patent, claim 46</p>	<p>Function: "producing an access code"</p> <p>Corresponding structure: Access server 14 and/or routing controller 30 having a microprocessor (152 or 232) programmed to implement the algorithm illustrated in FIG. 7, including step 196 and/or FIG. 12. Various embodiments of an access server and/or a routing controller producing an access code are disclosed at col. 13, line 59 to col. 22, line 60.</p>

Claim Term	Agreed Construction
<p>“means for causing the wireless apparatus to establish communications with the destination node through the communications channel identified by the access code in the access code reply message”</p> <p>’721 patent, claim 20</p>	<p>Function: “causing the wireless apparatus to establish communications with the destination node through the communications channel identified by the access code in the access code reply message”</p> <p>Corresponding structure: Mobile telephone 12 having a microprocessor 52 programmed to implement the algorithm illustrated in Figure 3, including block 149 where the microprocessor 52 initiates a voice/video call through the communications channel identified by the access code. The mobile telephone 12 additionally includes I/O port(s) 56 capable of acting as an interface for communication with external networks (e.g., 70, 72, 15, 16).</p>
<p>“means for causing a routing controller to produce an access code identifying a communications channel on a gateway through which communications between the wireless device and the destination node can be conducted”</p> <p>’721 patent, claim 77</p>	<p>Function: “causing a routing controller to produce an access code identifying a communications channel on a gateway through which communications between the wireless device and the destination node can be conducted”</p> <p>Corresponding structure: Access server 14 and/or routing controller 30 having a network interface (e.g., 156) and at least one processor (e.g., 152 in Figure 6) performing a method equivalent to process 190, including block 196, in Figure 7, to transmit a request to the routing controller 30; and/or at least one network interface (e.g., 236) and processor (e.g., 232 in Figure 8) to receive and process a request to produce an access code identifying a communications channel.</p>

Dated: March 17, 2023

Respectfully submitted,

/s/Lewis E. Hudnell, III

Lewis E. Hudnell, III
lewis@hudnelllaw.com

Nicolas S. Gikkas
nick@hudnelllaw.com

Stanley H. Thompson
stan@hudnelllaw.com

Hudnell Law Group P.C.
800 W. El Camino Real Suite 180
Mountain View, California 94040
T: 650.564.3698
F: 347.772.3034

Sean Franklin Parmenter
sean@parmenterip.com
Parmenter Intellectual Property Law,
PLLC
8980 N Pine Hollow Drive
Cedar Hills, Utah 84062
T: 925.482.6515

William M. Parrish
bparrish@stradlinglaw.com
Stradling Yocca Carlson & Rauth
500 W. 2nd Street
Austin, Texas 78703
T: 512.788.5020

**ATTORNEYS FOR PLAINTIFF
VOIP-PAL.COM, INC.**

/s/ R. William Sigler (with permission)

Alan M. Fisch (*pro hac vice*)
alan.fisch@fischllp.com

R. William Sigler (*pro hac vice*)
bill.sigler@fischllp.com

Jeffrey M. Saltman (*pro hac*)
jeffrey.saltman@fischllp.com

Lisa N. Phillips (*pro hac vice*)
lisa.phillips@fischllp.com

FISCH SIGLER LLP
5301 Wisconsin Avenue NW
Suite 400
Washington, DC 20015
202.362.3500

M. Craig Tyler
Texas Bar No. 00794762
CTyler@perkinscoie.com
PERKINS COIE LLP
500 W 2nd St, Suite 1900
Austin, TX 78701-4687
Tel: (737) 256-6113
Fax: (737) 256-6300

Daniel T. Shvodian (*pro hac vice*)
dshvodian@perkinscoie.com
Christopher Kelley (*pro hac vice*)
ckelley@perkinscoie.com

PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Tel: 650.838.4300
Fax: 650.838.4350

/s/Laura Wytsma (with permission)

Deron Dacus
State Bar No. 0079-553 THE DACUS
FIRM
821 ESE Loop 323, Suite 430 Tyler,
Texas 75701
Tel: (903)705-1117
Fax: (903) 581-2543
ddacus@dacusfirm.com

Frank C. Cimino, Jr. (*pro hac vice*)
Megan S. Woodworth (*pro hac vice*)
William Lawrence (*pro hac vice*)
VENABLE LLP
600 Massachusetts Avenue, NW
Washington, DC 20001
(202) 344-4569
FCCimino@Venable.com
MSWoodworth@Venable.com
WCLawrence@venable.com

William Hector (*pro hac vice*)
VENABLE LLP
101 California Street
Suite 3800
San Francisco, CA 94111
(415) 653-3750
WAHector@Venable.com

Laura Wytsma (*pro hac vice*)
VENABLE LLP
LAWytsma@venable.com
2049 Century Park East, Suite 2300
Los Angeles, CA 90067
T 310.229.9900

**ATTORNEYS FOR DEFENDANTS
VERIZON COMMUNICATIONS
INC., CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS,
VERIZON SERVICES CORP., AND
VERIZON BUSINESS NETWORK
SERVICES LLC**

/s/Amanda Tessar (with permission)

Amanda Tessar

ATessar@perkinscoie.com

PERKINS COIE LLP

1900 Sixteenth Street, Suite 1400

Denver, Colorado 80202-5255

Martin E. Gilmore

MGilmore@perkinscoie.com

PERKINS COIE LLP

500 W 2nd St 1900

Austin, Texas 78701

Melissa Richards Smith

Texas Bar No. 24001351

melissa@gillamsmithlaw.com

GILLAM AND SMITH, L.L.P.

303 South Washington Avenue

Marshall, TX 75670

(903)934-8450

Fax: (903)934-9257

**ATTORNEYS FOR DEFENDANT T-
MOBILE USA, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the forgoing FIRST SUPPLEMENTAL JOINT CLAIM CONSTRUCTION STATEMENT via the Court's CM/ECF system pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5(b)(1) this 17th day of March, 2023.

By: /s/Lewis E. Hudnell, III

Lewis E. Hudnell, III

lewis@hudnelllaw.com

Hudnell Law Group P.C.

800 W. El Camino Real Suite 180

Mountain View, California 94040

T: 650.564.3698

F: 347.772.3034